

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In Re:

Ronald C. Munn and

Cynthia L. Munn,

Debtor(s)

Bky. Case No.: 03-36940

**RESPONSIVE MOTION TO  
NOTICE OF MOTION AND MOTION  
FOR DISMISSAL OR CONVERSION**

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Ronald C. Munn and Cynthia L. Munn, by and through their undersigned attorney hereby submits the following Responsive Motion to Notice of Motion and Motion for Dismissal or Conversion, set for hearing before The Honorable Gregory F. Kishel, Bankruptcy Court Judge, U.S. Courthouse, Courtroom 228A, 316 N. Robert Street, St. Paul, MN on September 23, 2004 at 10:30 a.m., as follows:

1. That the debtors inadvertently became delinquent in their Plan payments and wish to propose a cure order in this matter.
2. That the debtors propose the following terms of said cure order: payment of \$460.00 prior to hearing; in addition to their regular Plan payments of \$460.00 per month debtors shall pay \$78.34 per month for the next six (6) months commencing with their October payment.

**WHEREFORE**, the Motion for Dismissal or Conversion should be stricken or continued to the next calendar to allow debtors and the Trustee to enter into a cure order as set forth herein.

Dated: September 22, 2004

/e/ BECKY A. MOSHIER

Becky A. Moshier

Attorney at Law

Attorney Reg. No. 207871

2233 University Avenue West, Ste. 420

St. Paul, Minnesota 55114

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ATTORNEY FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

In Re: Ronald C. Munn  
Cynthia L. Munn,

Bankruptcy Case No.: 03-36940 GFK

**UNSWORN DECLARATION OF SERVICE**

I, Becky A. Moshier, Attorney at Law, licensed to practice law in this Court, with office address of 2233 University Avenue West, Suite 420, St. Paul, Minnesota 55114, declare that on September 22, 2004, I served a copy of the Responsive Motion to Notice of Motion and Motion for Dismissal or Conversion to each of the entities named below by faxing to each of them a copy thereof at the following fax numbers:

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U.S. Trustee  
1015 U.S. Courthouse  
300 South Fourth Street  
Mpls., MN 55415  
Fax: (612) 664-5516

Jasmine Z. Keller  
Chapter 13 Trustee  
12 S. 6<sup>th</sup> St., Suite 310  
Mpls., MN 55402  
Fax: (612) 338-4529

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And I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: September 22, 2004

/e/ BECKY A. MOSHIER  
Becky A. Moshier  
Attorney at Law